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August 28, 2020

VIA ECF

The Honorable Kevin N. Fox.
United States District Court
Southern District of New York
40 Foley Square,
New York, NY 10007

**Re: *Actava TV, Inc., et al. v. Joint Stock Company “Channel One Russia
Worldwide” et al. (18-cv-06626)***

Dear Judge Fox:

We represent Defendant Broadcasters in this action. Pursuant to Local Civil Rule 5.2. and Rule 4.A.2. of the Court’s Individual Practices we write to request a sealing order for docket entries ECF 192 and ECF 192-1 with leave to re-file the relevant documents under seal. Docket entries ECF 192 and ECF 192-1 contain information Plaintiffs have designated confidential under Paragraph 2 of the May 17, 2019 Protective Order (ECF 104). Annexed to this letter motion is a proposed order.

Respectfully submitted,

/s/ Hardin P. Rowley

Cc: All Counsel (via ECF)